

# **EXHIBIT 1**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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ALEXANDRE ANSARI, individually,

Plaintiff,

Index No:

V.

20-10719

MOISES JIMENEZ, in his individual  
Capacity; CITY OF DETROIT, a  
Municipal corporation; jointly and  
severally,  
Defendants.

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VIDEOTAPED DEPOSITION OF MOISES JIMENEZ

DATE: Thursday, September 2, 2021

TIME: 10:15 a.m.

REPORTED BY: Lynn Ledoux-Moore, CER-9046

JOB No.: 7041

HELD AT: Mueller Law Firm

1 stationary a block up in a remote, vacant house. He was  
2 moving through Livernois.

3 Q I understand. Did you think it was  
4 coincidence that right before Tommy Figueroa (sic) was  
5 shot, that Jose Sandoval's in the immediate area?

6 A Jose Sandoval was always in that area.

7 Q Did you think it was a coincidence?

8 A No.

9 Q In other words, you, being an experienced  
10 detective, would be looking at him as he's the one  
11 involved in his murder, correct?

12 A Correct.

13 Q And given what you thought, either he might be  
14 the shooter or he's got a hitman?

15 A Correct.

16 Q All right. And, in fact, the second murder of  
17 Tommy Edwards four days later, you got to know it's a  
18 hit, right?

19 A Correct.

20 Q Which you, as an experienced detective, are  
21 thinking Jose Sandoval put out the hit on both of them?

22 A Correct.

23 Q And if Alex Ansari gets arrested for the  
24 murders as the shooter, then he would have to be the  
25 hitman for Jose Sandoval?

1 A Correct.

2 Q But you had no connection between Alex Ansari  
3 and Jose Sandoval, correct?

4 A Correct.

5 Q Did you explain all of this to Ms. Tusar, that  
6 our theory is that Ansari is the hitman for Sandoval,  
7 and Sandoval's a big drug player, and we think it's  
8 related to either the girlfriend or the theft?

9 A That is correct.

10 Q You explained all that to Erika Tusar?

11 A Yes. All the knowledge I had about these  
12 cases, Prosecutor Tusar knew about it because she was  
13 privy to all of the cases. There's three cases in one  
14 binder. Well, one plastic tote, that's probably the  
15 best way to describe it.

16 Q So, what you're telling us, and you're telling  
17 our jury, is that the defense -- if the defense didn't  
18 get information relating to Sandoval and the felonious  
19 assault case, and Sandoval and these theories, the  
20 connection between Sandoval and the two murders, it's  
21 because Erika Tusar didn't turn it over, correct?

22 A Because they were theories. I had no physical  
23 evidence that would put Sandoval -- I didn't have a -- a  
24 witness. I didn't have a statement. I didn't have  
25 video. The trackers showed drive by. No phone

1 connection in all his phones, not just a phone, in all  
2 his phones. I had no physical evidence whatsoever to be  
3 placed in an investigator's report to include him in the  
4 arrest warrant.

5 Q Did you ever put in a document, in a memo, in  
6 a progress notes, or anything, your theory that this is  
7 what we think happened?

8 A I don't believe so, sir.

9 Q Because the context of Alex Ansari being  
10 arrested for these two murders is that he must be the  
11 hitman for Sandoval.

12 A Correct.

13 Q Right? Because, otherwise, we sure know it  
14 wasn't two random murders.

15 A No.

16 Q And we've got no connection between Ansari and  
17 anybody in this case?

18 A Correct.

19 Q So, if you were the Defendant, Ansari,  
20 wouldn't you want to know that the police are basically  
21 thinking you're the hitman for some drug dealer?

22 A That's correct.

23 Q Because that way you can attack it, just like  
24 I did, right?

25 A Yes.